



# VAN DER VEEN, HARTSHORN, LEVIN & LINDHEIM

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April 11, 2025

***Via E-Filing***

Hon. Julien Xavier Neals, U.S.D.J.  
 United States District Court, District of NJ  
 MLK Jr. Fed. Bldg. & US Courthouse  
 50 Walnut St., Courtroom MLK 5D  
 Newark, NJ 07102

**Re: Lunsford v. Rutgers University, et al.**  
**Docket No. 24-4359**

Dear Judge Neals,

Please accept this correspondence on behalf of Plaintiff Eric Lunsford in the above-referenced matter. We write to respectfully request one final 45-day extension of the discovery deadline in this matter, which is currently set to end on April 14, 2025. Defense counsel has consented to this request. The Parties require additional time to complete the depositions of several Rutgers' employees, which have been difficult to schedule due to certain employees' leave and pre-planned vacations. As such, we respectfully submit that a final 45-day extension would be appropriate to ensure that the Parties have sufficient time to complete these depositions and address any discovery issues that may arise as a result. If granted, the new deadlines would be as follows:

1. Fact Discovery & Identification of Affirmative Experts: May 29, 2025
2. Affirmative Expert Reports: June 30, 2025
3. Responding Expert Reports: July 30, 2025
4. Expert Discovery Deadline: August 29, 2025

We thank Your Honor for the Court's consideration of this matter.

Sincerely,

/s/ Kaitlin C. McCaffrey  
 Kaitlin C. McCaffrey

cc: Margaret Raymond-Flood, Esq. (via PACER)  
 Michael Townsend, Esq. (via PACER)